

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

NO. 22-MC-

\$34,800.00

Defendant *in rem*.

**JOINT MOTION TO EXTEND
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America and Claimant Eric Ramos, through attorney of record, Alaleh Kamran, authorized by 18 U.S.C. § 983(a)(3)(A), move the court to extend the time in which the United States is required to file a complaint for civil judicial forfeiture from December 15, 2022 to January 28, 2023 regarding property to which a claim has been filed by the claimant in an administrative forfeiture proceeding with the Customs and Border Protection (CBP), and in support state:

1. The seized property in the custody of the CBP is described as:
 - a. \$34,800.00 in U.S. currency (“the property”).
2. The CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to interested parties.
3. The time has expired for any person to file a claim to the property under 18 U.S.C. § 983(a)(2)(A)-(E).

4. No other person has filed a claim to the property as required by law in the administrative forfeiture proceeding.

5. According to 18 U.S.C. § 983(a)(3)(A)-(C), the United States is to file a judicial forfeiture action not later than 90 days after a claim has been filed or return the seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

6. On July 14, 2022, DEA Dallas/Fort Worth (DFW) Airport Interdiction HIDTA Group (DFW HIDTA) officers seized the property from Francisco Javier Casillas Avila at the DFW airport in Dallas, Texas.

7. On September 16, 2022, the CBP received a claim for the property through Ramos's attorney of record, Alaleh Kamran.

8. Pursuant to 19 U.S.C. §§ 1603-04, the seizing agency transmitted the claim to the United States Attorney's Office to pursue a judicial forfeiture action against the property.

9. Unless the court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with the claim(s) filed by Ramos expires on December 15, 2022.

10. The parties have agreed to extend the time for filing a judicial action to and including January 28, 2023. The United States requests an order of court to extend the time for filing a judicial action to and including January 28, 2023 to allow additional time for the parties to explore an agreed early resolution of this case.

Conclusion

Therefore, the parties request an order to extend the filing period for a judicial forfeiture action to and including January 28, 2023.

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

/s/ Elyse J. Lyons

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